

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.)
) CR. NO. 04-10164-DPW
SHON ROWELL)
)

JOINT MEMORANDUM
PURSUANT TO LOCAL RULE 116.5(A)

Pursuant to Local Rule 116.5(A), the United States and Defendant Shon Rowell (collectively, the "parties") state as follows:

(1) The parties do not seek relief from the applicable timing requirements imposed by L.R. 116.3.

(2) The defendant requests discovery concerning expert witnesses. The parties propose that the government be required to disclose such discovery 30 days prior to trial, and that the defendant be required to provide reciprocal discovery 14 days prior to trial.

(3) The government anticipates providing additional discovery.

(4) The defendant presently intends to file one or more dispositive motions, and therefore requests that a motion date for filing such pretrial motions be established under Fed. R. Crim. P. 12(c).

(5) The parties propose that the Court enter an order excluding the 28-day time period following the defendant's arraignment, as well as the time period from the initial to the

final status conference.

(6) At present, the parties are unsure whether the case will go to trial, but estimate a trial would last approximately four days.

(7) The parties propose that the Court convene a final status conference in late September, 2004.

SHON ROWELL
By His Attorney

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By:

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